

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re: Carla Edmonds)	Chapter 13 Proceeding
)	Case No. 18-11291
Debtor)	Judge Jessica E. Price Smith

REPLY TO TRUSTEE'S OBJECTION TO CONFIRMATION

Now comes debtor Carla Edmonds, by and through counsel, and in reply to the Trustee's objection to confirmation submit the following:

1. A new wage order has been filed.
2. KFORCE pay advices were forwarded to the Trustee. It should be noted that this is a temporary agency and a 3 month placement. After the 3 months, debtor may or may not be hired or accept the job. Further, the salary is not guaranteed..
3. Debtor amended Form 122C to reflect her current charitable donations of \$150.00 month. In 2017, she was unable to give as much as she would have liked to due to her medical disability.
4. Regarding the vehicle that debtor is surrendering, it is a 2010 Cadillac worth \$6,400.00 with a balance owed of on or about \$21,000.00. Payments were \$516.00 per month. It was out of warranty and in need of a \$3,500.00 repair. Instead, debtor did purchase a 2015 vehicle prior to filing bankruptcy. The balance due is \$18,987.80, which debtor will pay through her plan for a total of \$22,425.00. (An Agreed Order will reflect same). Payments will be \$373.75 per month. Debtor must have a vehicle to work and it does not seem unreasonable.
5. Debtor's modified plan pays \$21,128.29 to unsecured creditors, which complies with Form 122C.

WHEREFORE, debtors respectfully request that the Modified Plan filed herein be confirmed.

Respectfully submitted,

/s/ Renée Heller

Renée Heller (0062894)

Attorney for Debtor

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CERTIFICATE OF SERVICE

A copy of the foregoing Reply was served on May 4, 2018, via regular U.S. Mail or electronically to:

Lauren Helbling, Trustee, ch13trustee@ch13cleveland.com

Carla Edmonds, debtor, 497 Forsythia Lane, Richmond Heights, OH 44143

Account Resolution Svcs, 1643 N. Harrison PKWY, Building H, Ste 100, Fort Lauderdale, FL 33323

Barclays Bank Delaware, 125 S West Street, Wilmington, DE 19801

Capital One Bank, USA N.A., ATTN: Bankruptcy, PO Box 30285, Salt Lake City, UT 84130

Cleveland Clinic, 9500 Euclid Avenue, Cleveland, OH 44195

Comenity Bank, Bankruptcy Department, PO Box 182125, Columbus, OH 43218

Credit Acceptance Corp., 25505 W. 12 Mile Road, Southfield, MI 48034

Credit First, NA, PO Box 81315, Cleveland, OH 44188-0315

Direct Loan SVC, PO Box 5609, Greenville, TX 75403-5609

Fedloan Servicing, PO Box 60610, Harrisburg, PA 17106

First Federal Credit Control, 24700 Chagrin Blvd., Ste. 205, Beachwood, OH 44122-5630

Franklin University, 201 S. Grant Ave., Columbus, OH 43215

GM Financial, PO Box 183123, Arlington, TX 76096-3123

I.R.S., PO Box 7346, Philadelphia, PA 19101-7346

RITA, ATTN Legal Department, PO Box 470537, Broadview Heights, OH 44147

Verizon Wireless Bk Dept, PO Box 3397, Bloomington, IL 61702

/s/ Renee Heller
Attorney for Debtor